

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2023-9-E

Dominion Energy South Carolina,
 Incorporated's 2023 Integrated
 Resource Plan (IRP) (See also Docket
 No. 2019-226-E)

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PETITION TO INTERVENE

The South Carolina Coastal Conservation League ("CCL") and Southern Alliance for Clean Energy ("SACE") (collectively, "Petitioners") respectfully petition the Public Service Commission of South Carolina ("Commission") to intervene in the above-captioned docket pursuant to R.103-825 of the Commission's rules of practice and procedure. In support of this petition, Petitioners state as follows:

1. The South Carolina Energy Freedom Act ("EFA") provides for Commission review of each utility's integrated resource plan ("IRP") every three years. S.C. Code Ann. § 58-37-40(A), (C). A utility's IRP must include specific data, forecasts, and analyses in addition to "several resource portfolios developed with the purpose of fairly evaluating the range of demand-side, supply-side, storage, and other technologies and services available to meet the utility's service obligations." S.C. Code Ann. § 58-37-40(B)(1). The Commission must approve the IRP if the preferred plan "represents the most reasonable and prudent means of meeting the electrical utility's energy and capacity needs as of the time the plan is reviewed." S.C. Code Ann. § 58-37-40(B)(2).

2. Pursuant to Commission Order Nos. 2022-594 and 2022-840, Dominion Energy South Carolina Incorporated's ("DESC" or "Company") submitted its Integrated Resource Plan ("IRP") on January 30, 2023.

3. Petitioners intervened and actively participated in DESC's 2020 IRP proceeding (Docket No. 2019-226-E), 2021 IRP Update proceeding (Docket No. 2021-9-E), and 2022 IRP Update Proceeding (2022-9-E). Petitioners have also attended each of the DESC IRP Stakeholder Workshops and participate in DESC's Energy Efficiency Advisory Group.

4. CCL is a nonprofit corporation organized under the laws of the State of South Carolina whose mission is to protect the natural environment of the South Carolina coastal plain and to enhance the quality of life in its communities by working with individuals, businesses, and government to ensure balanced solutions. CCL and its members support the development of energy policy that is in the public interest of South Carolinians. CCL has members in South Carolina who receive electricity service from DESC and who are impacted by DESC's integrated resource planning, which influences decision-making about supply- and demand-side resources and impacts the cost of electricity. The principal address of CCL is 131 Spring Street, Charleston, South Carolina 29402.

5. SACE is a nonprofit organization whose mission is to promote responsible and equitable energy choices to ensure clean, safe and healthy communities throughout the Southeast. SACE and its members are interested in promoting greater reliance on clean energy resources to meet the South's energy needs. Like CCL, SACE has members in South Carolina who receive electricity service from DESC and who are impacted by

DESC's integrated resource planning, which influences decision-making about supply- and demand-side resources and impacts the cost of electricity. SACE's principal address is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Georgia and North Carolina, and in-state staff in Florida and South Carolina.

6. Through their involvement in this proceeding, Petitioners seek to ensure that DESC is undertaking a robust and transparent planning process that fully accounts for fuel cost risks to customers and the benefits of cost-effective clean energy alternatives. Participation in this proceeding is aimed at supporting clean energy decisions that will lead to cleaner, safer, and healthier communities for all South Carolinians.

7. Pursuant to R. 103-804(T) of the Commission's Rules of Practice and Procedure, the Petitioners are represented by counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record and participate fully in this proceeding.

Respectfully submitted this 22nd day of February, 2023.

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*Attorneys for Petitioners South Carolina
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CERTIFICATE OF SERVICE

On behalf of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy, I hereby certify that the parties listed below have been served via first class U.S. Mail or electronic mail with a copy of the *Petition to Intervene*.

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This 22nd day of February, 2023.
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